

Entergy Corporation (an electric utility serving portions of Arkansas, Louisiana, Mississippi, and Texas) recommends that FCC disapprove the proposal to allocate the 135.7 to 137.8 and 160 to 190 Khz band for usage by amateur radio operators.

The high voltage electrical power system could be subjected to false protective signaling for amateur radio operation. Presently, there are procedures that prevent frequency interference of unlicensed powerline carrier systems and other licensed facilities (such as navigation beacons). This involves knowing the fixed location of the powerline carrier communications path and its proximity to any known licensed beacon. Amateur radio operators may not necessarily operate at a permanent, fixed location thereby making it difficult to ascertain if an interference condition may exist.

Entergy Corporation urges the commission to pay particular attention and consider the following statements in the FCC 02-136 Document (released May 15, 2002):

1. Page 7, Item 17 - Nature of FSK operation
2. Page 8, Item 18 - Separation distance
3. Page 8, Item 19 - Not cost effective to retrofit PLC
4. Page 8, Item 20 - Difficulty in calculating EIRP

The FCC should consider that PLC systems for electric system protection have been a traditional, cost effective approach for electric utilities for over 50 years. Entergy Corporation would need to retrofit up to 40 existing PLC systems if the proposal to permit amateur radio operation in the 135.7 to 137.8 Khz bands and even more impact would occur for operation in the 160 to 190 Khz band.

Entergy Corporation strongly urges the commission to dismiss the proposal to permit amateur radio operations in the LF band where PLC systems are presently operating.